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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KELLY JO GOFORTH,

Plaintiff,

vs.

KILOLO KIJAKAZI,
Acting Commissioner of Social Security,

Defendant.

)
) Case No.: 2:22-cv-01792-VCF

)
) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE CERTIFIED**
) **ADMINISTRATIVE RECORD AND ANSWER;**
) **[PROPOSED] ORDER**

) **(FIRST REQUEST)**
)
)

1 Defendant, Kilolo Kijakazi, Commissioner of Social Security (the “Commissioner”), by and
2 through the undersigned attorneys, hereby moves for a thirty-day extension of time to file the Certified
3 Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s
4 Complaint are due to be filed by January 3, 2023.

5
6 The certified administrative record (CAR) in this case has not been finalized for filing. The
7 agency’s Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel for the
8 Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing. OAO has
9 indicated it needs additional time to prepare the CAR. Counsel for the Commissioner has consulted with
10 Plaintiff’s counsel who advised that he has no objections to an extension of thirty-days.

11 This request is made in good faith and is not intended to delay the proceedings in this matter. It is
12 therefore respectfully requested that Defendant be granted an extension of time to file the CAR and
13 answer to Plaintiff’s Complaint, through and including February 2, 2023.
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15
16 Dated: January 3, 2023

Respectfully submitted,

17 JASON M. FRIERSON
18 United States Attorney

19 /s/ Oscar Gonzalez de Llano
20 Oscar Gonzalez de Llano
21 Special Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD AND ANSWER; [PROPOSED] ORDER** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Leonard Stone

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I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 3, 2023

/s/ Oscar Gonzalez de Llano
Oscar Gonzalez de Llano
Special Assistant United States Attorney

JASON M. FRIERSON
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Defendant.

)
) Case No.: 2:22-cv-01792-VCF

) ~~PROPOSED~~ ORDER GRANTING
) EXTENSION OF TIME

1 Based upon Defendant's Motion for Extension of Time to File Certified Administrative Record and
2 Answer, and for good cause shown, **IT IS ORDERED** that the date on which Defendant's answer is due
3 is extended by thirty days, from January 3, 2023 to February 2, 2023. Defendant shall file the answer on
4 or before February 2, 2023. If Defendant is unable to produce the certified administrative record necessary
5 to file an answer in accordance with this Order, Defendant shall request an additional extension prior to the
6 due date.

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9 IT IS SO ORDERED:

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11 _____
12 UNITED STATES MAGISTRATE JUDGE

13 DATED: 1-3-2023
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